

To: Pidgeon, Bill[pidgeon.bill@epa.gov]
Cc: John O'Cain[John.O'Cain@arb.ca.gov]; Dalton, Joel[Dalton.Joel@epa.gov]
From: Good, David
Sent: Fri 1/22/2016 4:30:37 PM
Subject: RE: EPA Audit of 2013 and 2014MY IUVP data for 3rd quarter of 2015 – FCA (Chrysler)
Greenhouse Gas (GHG) data
[Chrysler Fiat 2013 IUVP data 11-12-2015.xlsx](#)
[Chrysler Fiat 2014 IUVP data 11-12-2015.xlsx](#)

Bill, please forward to the Chrysler IUVP representative.

Thanks

Dave

RE: EPA Audit of 2013 and 2014MY IUVP data for 3rd quarter of 2015 – FCA (Chrysler)
Greenhouse Gas (GHG) data

EPA is auditing the IUVP data which manufacturers have entered into EPA's Verify database. For your company, a summary is shown below of the 2013 and 2014 GHG data (CREE and CH4) as of November 12, 2015 (for the 3rd quarter of 2015 calendar year). We are concerned about any GHG data that might be missing from the EPA database. We plan to audit the 2013 and 2014 IUVP data again in February, 2016 (for the 4th quarter of 2015 calendar year). The 2013 and 2014 IUVP data (from EPA's Verify database as of November 12, 2015) are attached.

2013 Model Year:

Number of 2013 IUVP test vehicles (column 6):

61

Number of vehicles with Combined CREE test results for the Hwy test (column 79): 58

Number of vehicles with Combined CREE standards (column 82):

44 (low)

Number of vehicles which failed the CREE standards (column 88):	1
Number of vehicles with CH4 test results for the FTP test (column 79)	64
Number of vehicles with CH4 standards (column 82):	51 (low)
Number of vehicles which failed the CH4 standards (column 88):	0

2014 Model Year:

Number of 2013 IUVP test vehicles (column 6):	61
Number of vehicles with Combined CREE test results for the Hwy test (column 79):	57
Number of vehicles with Combined CREE standards (column 82):	57
Number of vehicles which failed the CREE standards (column 88):	1
Number of vehicles with CH4 test results for the FTP test (column 79)	61
Number of vehicles with CH4 standards (column 82):	58
Number of vehicles which failed the CH4 standards (column 88):	1

Summary:

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GHG Results: For vehicles which you entered test results and standards, the CREE and CH4 failure rates do not seem excessive or indicate the presence of any GHG pattern failures .

However we encourage you to take a look at any failing vehicles (using your good engineering judgment) and take corrective action as necessary to assure that the failures are not repeated in the future (e.g. for carryover vehicles).

Data Entry: Please make sure that in the future, GHG emission levels and the correct GHG emission standards are entered for all of your IUVP test vehicles. In addition, please enter any missing CREE and CH4 emission results and emission standards for your 2013 and 2014 IUVP vehicles----and send Bill Pidgeon and John O'Cain a short email message letting them know that you have made the corrections to the EPA Verify IUVP database.

Reporting GHG Failures: As a reminder, manufacturers are required to report any IUVP failures to EPA and CARB within 72 working hours of the time they have identified the failure (including CREE, Opt-CREE and CH4 failures, as applicable); ref. 40 CFR 86.1847-01(d). For EPA, IUVP failures should be reported via email to IUVP-Failures@epa.gov. For CARB, IUVP failures should be reported IUVP@arb.ca.gov with a cc copy to John.O'Cain@arb.ca.gov.

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Thanks

Dave Good,

U.S. EPA